

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

- v. -

ROBERT COPLAN,  
MARTIN NISSENBAUM,  
RICHARD SHAPIRO,  
BRIAN VAUGHN,  
DAVID SMITH, and  
CHARLES BOLTON,

Defendants.

MOTION FOR ADMISSION OF  
PAUL M. ELLIS PRO HAC VICE

(S-1) 07 Cr. 453 (SHS)

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PLEASE TAKE NOTICE that, pursuant to Rule 1.3 (c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Paul B. Bergman, a member in good standing of the Bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

Paul M. Ellis, Esq.  
Butler, Snow, O'Mara, Stevens & Cannada, PLLC  
P.O. Box 22567,  
210 E. Capitol Street, 17th Floor  
AmSouth Plaza Building  
Jackson, MS 39225-2567  
Tel. No.: 601-985-4511  
Fax No.: 601-985-4500  
E-mail: paul.ellis@butlersnow.com

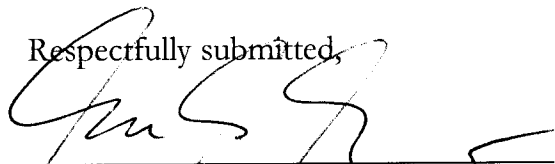
in connection with the representation of Brian Vaughn. Paul M. Ellis is a member in good standing of the Mississippi Bar and the Tennessee Bar. There are no pending disciplinary proceedings against Paul M. Ellis in any State or Federal court.

JUL 30 2008

90925-658643

Dated: July 28, 2008  
New York, New York

Respectfully submitted,



PAUL B. BERGMAN, Esq. (0502)  
950 Third Avenue  
New York, New York 10022  
Tel. No.: 212-355-7711  
Fax No.: 212-755-5509  
E-mail: berglaw@mindspring.com

TO: Clerk of the Court  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Lauren Goldberg, Esq.  
Marshall Alan Camp, Esq.  
Assistant U.S. Attorneys  
Southern District of New York  
One St. Andrew's Plaza  
New York, New York 10007

Brian D. Linder, Esq.  
Isabelle A. Kirshner, Esq.  
Clayman & Rosenberg  
305 Madison Avenue  
New York, New York 10165

John J. Tigue, Jr., Esq.  
Jeremy H. Temkin, Esq.  
Kristy W. Milkov, Esq.  
Morvillo, Abramowitz, Grand  
Iason, Anello & Bohrer, P.C.  
565 Fifth Avenue  
New York, New York 10017

Paula M. Junghans, Esq.  
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1800 M Street, N.W. Suite 1000  
Washington, D.C. 20036

Howard Heiss, Esq.  
Mark Racanelli, Esq.  
O'Melveny & Myers, LLP  
Times Square Tower  
7 Times Square  
New York, New York 10036

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CHARLES BOLTON,	:
	:
Defendants.	:
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AFFIDAVIT OF PAUL B. BERGMAN  
IN SUPPORT OF MOTION FOR  
ADMISSION OF PAUL M. ELLIS  
PRO HAC VICE

(S-1) 07 Cr. 453 (SHS)

STATE OF NEW YORK :  
: ss.:  
COUNTY OF NEW YORK :

PAUL B. BERGMAN, being duly sworn, hereby deposes and says as follows:

1. I am local counsel for Brian Vaughn, a defendant in the above-captioned action. I am familiar with the proceedings in this case. I make this affidavit in support of the within motion to admit Paul M. Ellis as counsel *pro hac vice* to represent Brian Vaughn in this matter. Except where the context shows otherwise, this affidavit is made upon information and belief.

2. I am a member in good standing of the Bar of the State of New York, and was admitted to practice law in March, 1968. I am also admitted to the Bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Paul M. Ellis is an associate at Butler, Snow, O'Mara, Stevens & Cannada, PLLC, in Jackson, Mississippi.

4. In 2006, Mr. Ellis earned his J.D. from the University of Mississippi School of Law, *cum laude*, where he served as the executive editor of the *Mississippi Law Journal*. He is admitted to practice in the United States District Courts for the Northern and Southern Districts of Mississippi, and the Western and Middle Districts of Tennessee, as well as the United States Courts of Appeal for the Fifth and Sixth Circuits.

5. I have found Mr. Ellis to be a skilled attorney and person of integrity. He is experienced in Federal Practice and with the Federal Rules of Procedure. Certificates of Mr. Ellis's good standing from the Supreme Court of Tennessee and the Supreme Court of Mississippi are annexed hereto as Exhibits A and B, respectively.

6. Accordingly, I am pleased to move the admission of Paul M. Ellis, *pro hac vice*.

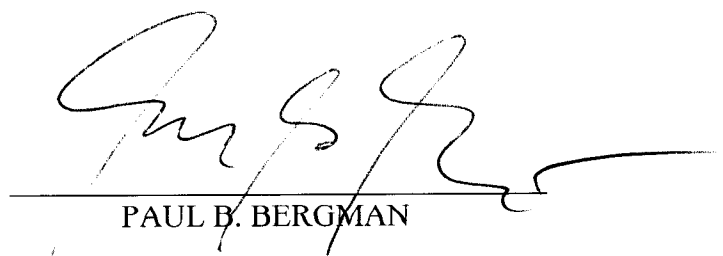
7. I respectfully submit a proposed order granting the admission of Paul M. Ellis, *pro hac vice*, which is annexed hereto as Exhibit C.

WHEREFORE it is respectfully requested that the motion to admit Paul M. Ellis, *pro hac vice* to represent Brian Vaughn in the above captioned matter, be granted.

Sworn to before me this  
28th day of July, 2008

  
NOTARY PUBLIC

MARK L. FREYBERG  
NOTARY PUBLIC, State of New York  
No. 31-4878056  
Qualified in New York County  
Commission Expires November 3, 19/2010

  
PAUL B. BERGMAN

***CLERK OF THE SUPREME COURT***

***STATE OF TENNESSEE***

*I, Michael W. Catalano, Clerk of the Supreme Court, do hereby certify that PAUL MICHAEL ELLIS is a licensed and practicing attorney of the Courts of this State, having taken the oath as prescribed by law, is enrolled as an attorney of this Court, and is in good standing. The Supreme Court is the Court of last resort in Tennessee.*

*Date of Enrollment: October 25, 2006.*

*In testimony whereof, I have set my hand and affixed the seal of the Court on this the 18<sup>th</sup> day of July, 2008.*

*Michael W. Catalano, Clerk*

By *Lisa Marsh* D.C.

# ***The Supreme Court of Mississippi***



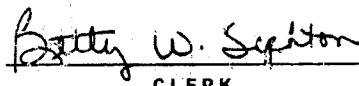
## ***Certificate of Good Standing***

*I, Betty W. Sephton, as Clerk of the Supreme Court of Mississippi, do hereby certify that **Paul Michael Ellis** was duly and legally admitted to practice law before the Supreme Court of Mississippi on October 11, 2006, and is now an attorney in good standing of the Bar of this Court, as shown by the records of said Court on file in this office.*

*I further certify that the Supreme Court of Mississippi is the highest court of record in this state.*

*Done on July 16, 2008, with the seal of the Supreme Court of Mississippi affixed.*

**The Supreme Court of Mississippi**

  
CLERK

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,	:	
	:	
- v. -	:	ORDER ADMITTING PAUL M.
	:	ELLIS <u>PRO HAC VICE</u>
ROBERT COPLAN,	:	
MARTIN NISSENBAUM,	:	07 Cr. 453 (SHS)
RICHARD SHAPIRO,	:	
BRIAN VAUGHN,	:	
DAVID SMITH, and	:	
CHARLES BOLTON	:	
	:	
Defendants.	:	

-----x

Upon the motion of Paul B. Bergman, attorney for Defendant, Brian Vaughn,  
and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Paul M. Ellis, Esq.  
Butler, Snow, O'Mara, Stevens & Cannada, PLLC  
P.O. Box 22567,  
210 E. Capitol Street, 17th Floor  
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Tel. No.: 601-985-4511  
Fax No.: 601-985-4500  
E-mail: paul.ellis@butlersnow.com

is admitted to practice *pro hac vice* as counsel for Defendant Brian Vaughn in the  
above captioned case in the United States District Court for the Southern District of  
New York. All attorneys appearing before this Court are subject to the Local Rules  
of this Court, including the Rules governing discipline of attorneys. If this action is  
assigned to the electronic Case filing (ECF) system, counsel shall immediately apply



for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: July \_\_\_, 2008  
New York, New York

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UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I, Paul B. Bergman, local counsel for Brian Vaughn, do hereby certify that on July 28, 2008, I caused to be served a copy of the within Motion for Admission of Paul M. Ellis *Pro Hac Vice* on the following attorneys by First Class Mail.

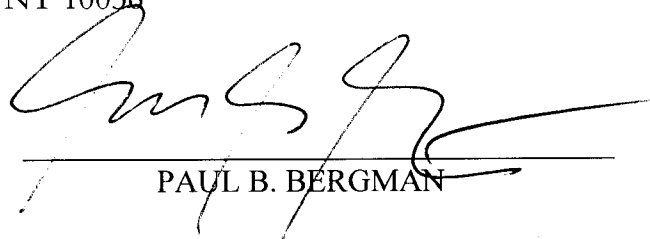
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PAUL B. BERGMAN